

REMARKS

Claims 1, 3-16, 18-22, 28-35, and 63-70 are pending. Reconsideration and withdrawal of all outstanding rejections are respectfully requested in light of the following remarks.

Claims 1, 3-16, 18-22, 28-35 and 63-70 stand rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent Publication No. 2001/0014486 to Glenn. Applicants respectfully traverse the rejection.

The present invention provides a die package having an adhesive flow restriction area. The adhesive flow restriction area impedes the flow of an adhesive material that is used in bonding a transparent element to a die to form the package. Independent claim 1 recites, *inter alia*, "a die . . . and a transparent element adhesively attached to said die by an adhesive material and having a first surface facing a first surface of said die, said first surface of said transparent element having at least one adhesive flow restriction area *for impeding flow of an adhesive across said first surface of said die.*"

Glenn fails to teach or suggest "a transparent element. . .having at least one adhesive flow restricting area for impeding flow of an adhesive" on a first side of the transparent element. Unlike the claimed invention, Figure 19 of Glenn relates to an "encapsulant locking feature" [0095], having a groove 90 which "increases the surface area of cover 89 in contact with bead 48, and thereby strengthens the connection between cover 89 and bead 48 and package 30." In the embodiment shown in Fig. 19, the groove 90 is centered over the bead 48 and does nothing to "restrict the flow of the adhesive" in either direction on the die. Glenn does not teach any variations on this central placement of groove 90. For at least these reasons, Applicants respectfully

request that the rejection of claim 1 and all dependent claims be withdrawn and the claims allowed.

Independent claim 18 recites an imaging device comprising, *inter alia*, "a die. . .and a transparent element adhesively attached to said die . . .[a] first surface of said die having at least one adhesive flow restriction area for impeding flow of an adhesive across said first surface of said die, wherein said adhesive flow restriction area comprises at least one trench."

Glenn fails to teach or suggest "[a] first surface of said die having at least one adhesive flow restriction area." Glenn does not show a trench, or any other adhesive flow restriction area in or on the first surface of a die. For at least these reasons, Applicants respectfully request that the rejection of claim 18 and all dependent claims be withdrawn and the claims allowed.

The Office Action argues that "alternate shapes and equivalent configurations" may be used to cure deficiencies in its §102(b) rejections. This argument is improper for two reasons. First, the Office Action misinterprets paragraph [0095] of Glenn, which states, in relevant part, that "groove 90 or an equivalent locking feature on second surface 51 may be combined with on of the side surface locking features of FIGS. 13-17." None of the disclosed "side surface locking features of FIGS. 13-17" read on the "adhesive flow restriction area" limitation of claims 1 and 18 because their side surface placement makes them incapable of impeding flow of an adhesive across a surface of a die. Second, and more importantly, any "equivalent locking feature" must be shown by the reference for that reference to anticipate under §102. To the extent the Office Action is making an obviousness argument, there is no motivation to modify Glenn as suggested by the Office Action to arrive at the claimed invention.

Application No. 10/751,441
Amendment dated November 6, 2005
After Final Office Action of September 9, 2005

Docket No.: M4065.1005/P1005

In view of the above amendment, applicant believes the pending application is in condition for allowance.

Dated: December 6, 2005

Respectfully submitted,

By 

Thomas J. D'Amico

Registration No.: 28,371

Jerome A. DeLuca

Registration No.: 55,106

DICKSTEIN SHAPIRO MORIN &
OSHINSKY LLP

2101 L Street NW

Washington, DC 20037-1526

(202) 785-9700

Attorneys for Applicant